

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LEONARD LICHT, ZHENGJUN CAI,
HENRY CHEN, DANIEL CHANG,
DOMINIC CHOW, CHENGGUO DONG,
IHAB W. FRANCIS, JOHN GORDON,
DALTON GREEN, MICHAEL GRILLI,
IRAKLIS KARABASSIS, NADER
LOBANDI, JAMES MOSKWA, ANH
NGUYEN, BRIAN ROTHUS, GORDON
SHAYLOR, RICHARD SLAVANT,
NATHANIAL THRAILKILL, JACK YAO,
and JUN ZHAI,

Plaintiffs,

v.

BINANCE HOLDINGS LIMITED, d/b/a
BINANCE.COM, BAM TRADING
SERVICES, INC., d/b/a BINANCE.US, and
CHANGPENG ZHAO,

Defendants.

No. 1:24-cv-10447-NMG

**DECLARATION OF AVI PERRY IN SUPPORT OF
MOTION TO WITHDRAW AS COUNSEL OF RECORD**

Pursuant to this court's Local Rule 83.5.2(c)(2), I, Avi Perry, hereby declare as follows:

1. I am a partner of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel") and a member in good standing of the bars of the States of New York, Connecticut, and the District of Columbia. I respectfully submit this declaration pursuant to Local Rule 83.5.2(c)(2) in support of the accompanying Motion to Withdraw as Counsel of Record.

2. Eight Quinn Emanuel attorneys—Isaac Saidel-Goley, Christopher Kercher, Peter Fountain, myself, Emily Kapur, Samuel Williamson, Ted Ovrom, and Zi Chun (Michelle) Wang—are currently counsel of record for Defendant Changpeng Zhao in this action.

3. Mr. Zhao has breached the material terms of his engagement agreements with Quinn Emanuel, and he has created adversity by filing an arbitration against Quinn Emanuel. As a result, Quinn Emanuel has terminated its representation of Mr. Zhao and cannot continue to represent Mr. Zhao in this matter.

4. Quinn Emanuel has notified Mr. Zhao of its withdrawal so that he may retain new counsel. To the extent necessary to comply with applicable ethical rules, Quinn Emanuel will assist with the transition of this matter to Mr. Zhao's new counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 10, 2025
Washington, D.C.

/s/ Avi Perry
Avi Perry